

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN :
CURRENTLY RESIDING IN NORTH :
CAROLINA, BY AND THROUGH NEXT :
FRIENDS, JOHN AND JANE DOE; AND JOHN :
AND JANE DOE, CITIZENS OF AFGHANISTAN:
AND LEGAL GUARDIANS OF BABY DOE, :
: Plaintiffs, :
: :
v. :
: :
JOSHUA MAST, STEPHANIE MAST, RICHARD :
MAST, KIMBERLEY MOTLEY, AND AHMAD :
OSMANI, :
: Defendants, :
: and :
: :
UNITED STATES SECRETARY OF STATE :
ANTONY BLINKEN AND UNITED STATES :
SECRETARY OF DEFENSE GENERAL :
LLOYD AUSTIN, :
: Nominal Defendants. :
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**PLAINTIFFS' MOTION, AND MEMORANDUM IN SUPPORT OF MOTION,
FOR THE ENTRY OF PROPOSED PROTECTIVE ORDER**

Plaintiffs, by their undersigned counsel, respectfully move the Court for entry of the attached Protective Order (attached as Exh. A).

As this court has already found, this case involves matters of a highly sensitive nature because 1) Baby Doe is a minor, and 2) information revealed in the course of discovery may

pose significant safety concerns to both parties and nonparties. *See* ECF No. 26. However, the Protective Order currently in place (*id.*) does not address how to treat confidential information (other than information that identifies Plaintiffs) that is provided in documents produced by the parties or obtained from third parties. Accordingly, Plaintiffs seek the entry of the attached protective order to govern the production of such confidential information.

No parties will be prejudiced by the entry of such an order.

Plaintiffs have asked counsel for Defendants (as well as Defendant Richard Mast, while he was appearing *pro se*) several times since December whether they object to the attached proposed protective order. To date, only the Nominal Defendants have provided input, which has been incorporated into the attached proposed protective order.

Accordingly, Plaintiffs respectfully request that the Court enter the proposed Protective Order attached as Exhibit A to this Motion.

February 13, 2023

Respectfully Submitted,

/s/ Maya Eckstein
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